

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001

03 MDL 1570 (RCC)

-----X

THIS DOCUMENT RELATES TO:

***THOMAS E. BURNETT, SR., ET AL. VS. AL BARAKA
INVESTMENT AND DEVELOPMENT CORP., ET AL.
03 CV 9849 (RCC); 03 CV 5738 (RCC)***

**DECLARATION OF JODI WESTBROOK FLOWERS IN SUPPORT OF PLAINTIFFS'
MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANT SULAIMAN AL-ALI'S MOTION
TO DISMISS WITH SUPPORTING POINTS AND AUTHORITIES**

JODI WESTBROOK FLOWERS declares under penalty of perjury:

1. I am attorney admitted to practice *pro hac vice* before this Court and am a member of MOTLEY RICE LLC, counsel for plaintiffs in *Burnett, et al. v. Al Baraka Investment & Development Corp., et al.*, Civil Action Nos. 03 CV 9849 and 03 CV 5738. I submit this declaration to provide the Court with the exhibits on which Plaintiffs rely in their Memorandum of Law in Opposition to Defendant Sulaiman Al-Ali's Motion to Dismiss with Supporting Points and Authorities.

2. Exhibit 1 is a true and accurate copy of a letter prepared by me that was faxed, mailed and emailed to counsel for Defendant Sulaiman Al-Ali on June 3, 2004.

3. Exhibit 2 is a true and accurate copy of the More Definite Statement as to Sulaiman Al-Ali filed with the Court on June 4, 2004.

4. Exhibit 3 is a true and accurate copy of the Summons and Proof of Service for Sulaiman Al-Ali, dated April 1, 2003.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 4, 2004.



JODI WESTBROOK FLOWERS